

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS,
HOUSTON DIVISION**

**NATIVIDAD FLORES,
Plaintiff,**

v.

**HARRIS COUNTY, SHERIFF ED
GONZALEZ, AND OFFICER
HOPKINS,
Defendants.**

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Civil Action No. 4:20-cv-3162

**DEFENDANTS HARRIS COUNTY AND SHERIFF ED GONZALEZ'
DESIGNATION OF EXPERT WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendants HARRIS COUNTY and SHERIFF ED GONZALEZ (collectively “County Defendants”) file their Designation of Expert Witness pursuant to the Court’s August 4, 2021 Order [Doc. #35] and Federal Rule of Civil Procedure 26. In support of said designation, the County Defendants state as follows:

1. County Defendants designate the following witness(es) under Rule 26(a)(2)(B), Federal Rules of Civil Procedure, who may testify at trial:

- a) Paul Adler, D.O., c/o OSS-Law Enforcement Advisors, 19018 Candleview Drive, Spring, Texas 77388 (281-288-9190). Dr. Adler is a retained expert in the field of medicine who will present evidence at trial under Federal Rules of Evidence 702, 703 and 705. He will provide testimony concerning his training and experience as a board-certified emergency medicine physician with substantial experience in correctional health. Dr. Adler will also provide testimony concerning reasonable medical standards for jails; whether the medical care provided to Natividad Flores (“Flores”) during his incarceration with Harris County Sheriff Office (“HCSO”) jail met medical standards; the medical care provide to Flores during his incarceration; and may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Flores’ alleged injuries. Dr. Adler will testify consistent with his written report. He may offer other opinions and conclusions to rebut Plaintiff’s experts, if any. *See* attached the following documents that will be served on Plaintiff, but not filed with the Court:

Exhibit “A” – Expert report dated November 10, 2021, with attachment

- Fee schedule listed at end of expert report

Exhibit “B” – CV of Dr. Paul Adler

Exhibit “C” – List of testimony/cases for Dr. Paul Adler

Exhibit “D” – other material used to form opinion that is listed on Attachment A to Dr. Adler’s report

- Clinical Pharmacology & Pharmacokinetics of Levetiracetem
[bates: OSS Bates -000425-000436]
- Levetiracetem
[bates: OSS Bates-000437-000446]

2. County Defendants may offer expert testimony from the following persons employed by Harris County. These employees are not specially employed to provide expert testimony in this case and their duties do not regularly involve giving expert testimony. Therefore, no report is required from these employees under the Federal Rules of Civil Procedure:

- a) Akins, Leah R., LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personal when interacting with Plaintiff during the time in question.
- b) Arceneaux, Annica, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HSCO who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as her knowledge, if any, of Plaintiff during the time in question.
- c) Benavides, Edmond, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HSCO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of the incident relating to Inmate Offense Report #2019-41381 and Plaintiff during the time in question.
- d) Boss, P., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HSCO who may testify about his background, education, training,

employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of the incident relating to Inmate Offense Report #2019-41381 and Plaintiff during the time in question.

- e) Brown, Leesa A., N.P., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. She may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. She may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- f) Campbell, Trina, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- g) Casillas, Gaston, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- h) Christian, Harry, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health

Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.

- i) Coleman, Darryl, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO jail administrator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations, as well as his knowledge, if any, of the events at issue in this lawsuit. He may offer opinions regarding the actions of the detention officers and medical staff who interacted with Plaintiff at the time in question. He may offer opinions that Harris County does not maintain a policy, practice or custom of conscience, deliberate indifference to inmates housed at the HCSO jail, including the Plaintiff. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO employees is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.
- j) Correa, A., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of the incident relating to Inmate Offense Report #2019-41381 and Plaintiff during the time in question.
- k) Dasi, Charles, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.
- l) Dougherty, Patrick, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Major with the HCSO Justice Management Bureaus who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations, as well as his

knowledge, if any, of the events at issue in this lawsuit. He may offer opinions regarding the actions of the detention officers and medical staff who interacted with Plaintiff at the time in question. He may offer opinions that Harris County does not maintain a policy, practice or custom of conscience, deliberate indifference to inmates housed at the HCSO jail, including the Plaintiff. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO employees is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

- m) George, Beena, NP, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. She may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. She may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- n) Gonzalez, Cindy, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.
- o) Gonzalez, Ed, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Defendant who is expected to testify about his background, education, training, employment history, job duties and responsibilities as Harris County Sheriff, authority of detention officers to act in various situations, as well as his knowledge, if any, of the events at issue in this lawsuit. He may offer opinions regarding the actions of the detention officers and medical staff who interacted with Plaintiff at the time in question. He may offer opinions that Harris County does not maintain a policy, practice or custom of conscience, deliberate indifference to inmates housed at the HCSO jail, including the Plaintiff. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO employees is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

- p) Green, Lovie L., LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- q) Henson, Louise C., M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. She may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. She may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- r) Ikwunze, Olukemi I., LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- s) Jack, Mary, RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.
- t) Joseph, T., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of the incident relating to Inmate Offense Report #2019-41381 and Plaintiff during the time in question.

- u) Kaminsky, Stephen, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personal when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- v) Kindrick, Jerimiah, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HSCO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of Plaintiff when he was incarcerated in 2016.
- w) Kloeber, Sandra L., FNP, N.P., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personal when interacting with Plaintiff during the time in question. She may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. She may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- x) Labiyi, Olabimpe, RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personal when interacting with Plaintiff during the time in question.
- y) Leistikow, Erin, RT, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background,

education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.

- z) Lockett, Noemi, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- aa) Longares, Yuli I., MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- bb) Lu, John, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- cc) Mabins, Candace L., MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health

Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.

- dd) Madeuke, Priscillia, NP, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. She may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. She may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- ee) Marcelin, Laquinta, MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- ff) Maxwell, Chinuru, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of the incident relating to Inmate Offense Report #2019-41381 and Plaintiff during the time in question.
- gg) Newman, Dariel, BSN, RN, CCHP, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Director of Nursing at HCSO Health Services who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical

personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.

- hh) Ngemhe, Marthe, RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- ii) Okororie, Francisca, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- jj) Onasanya, Memunat, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.
- kk) Pugh, S. HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of Plaintiff regarding Inmate Offense Report #2016-24657.
- ll) Radhakrishnan, Hari, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.

- mm) Roberts, Neomi, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of Plaintiff regarding Inmate Offense Report #2016-24657.
- nn) Santiago, Francisco A., M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.
- oo) Sokhna, Ndeye, MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- pp) Staton, Samantha, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HCSO who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as her knowledge, if any, of Plaintiff during the time in question.
- qq) Sunder, Laxman, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical director of HCSO Health Services who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Plaintiff and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Plaintiff did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Plaintiff's

alleged injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Plaintiff's alleged injuries.

- rr) Thomas, Mary, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- ss) Timario, Victoria S., R.N., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.
- tt) Toussaint, Dora, MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during the time in question.
- uu) Varghese, Shaji, CPht, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Pharmacy technician who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.
- vv) Villarreal, Karen, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.

ww) Warren, T., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Employee of HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers and deputies at the jail when interacting with inmates, as well as his knowledge, if any, of the incident relating to Inmate Offense Report #2019-41381 and Plaintiff during the time in question.

3. The following witnesses have been listed and designated as persons with knowledge of relevant facts. These persons are not retained experts but may testify about issues to be addressed and/or addressed in their testimony. These witnesses are law enforcement and/or medical providers with knowledge of the events at issue in this case and whose expertise is the result of their work experience, education and/or training. These witnesses are not being paid as experts and as such, are treated as ordinary witnesses for purposes of discovery. County Defendants reserve the right to elicit opinion testimony from any of the following witnesses in their particular expertise:

- a) Benavides, Henry, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.
- b) Brown, J.A., Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-884-3131). Officer who arrested Plaintiff in 2016 who may testify about his background, education, training, employment history, job duties and responsibilities with HPD, authority of peace officers to act in various situations, as well as his knowledge, if any, of Plaintiff.
- c) Brown, L., M.D., LabCorp, 7207 N. Gessner, Houston, Texas 77040 (713-856-8288). May have knowledge, if any, of Plaintiff's medical history during the relevant time period.
- d) Camino, Abel, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.
- e) Camino-Benech, Abel, R.N., St. Joseph Medical Center, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). May have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.

- f) Cerda, D.A., Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-884-3131). Officer who arrested Plaintiff in 2016 who may testify about his background, education, training, employment history, job duties and responsibilities with HPD, authority of peace officers to act in various situations, as well as his knowledge, if any, of Plaintiff.
- g) Chavez, Sergio, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.
- h) Choate, Timothy, R.N., St. Joseph Medical Center, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). May have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.
- i) Cuzzo, Fran, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). A custodian of records for Houston Fire Department and is expected to testify that HPD Incident Report #1907300142, including but not limited to all reports, supplemental reports, medical reports, medical notes and all other records, documents contained in said file is a business record and record of regularly conducted activity within the meaning of the Federal Rules of Evidence.
- j) Esku, Kyle, M.D., LabCorp, 7207 N. Gessner, Houston, Texas 77040 (713-856-8288). May have knowledge, if any, of Plaintiff's medical history during the relevant time period.
- k) Gerring, Jonathan, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.
- l) Holmes, Maurice, M.D., St. Joseph Medical Center Emergency Department Staff, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). May have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.
- m) Ichtertz, Tricia, R.N., St. Joseph Medical Center, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). May have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.
- n) Mata, Carlos, Harris County Constable Precinct #4, 6831 Cypresswood Drive, Spring, Texas 77379 (c/o Jennifer Callan: 713-274-5146). Deputy with Harris County Constable Precinct #4 who may testify about his background, education, training, employment history, job duties and responsibilities with Precinct #4, authority of peace officers to act in various situations, as well as his knowledge of Plaintiff at the time of his arrest on or about July 27, 2019.
- o) Morales, Jordan, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.

- p) Mudasiru-Dawodu, Eniola, M.D., St. Joseph Medical Center, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). May have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.
- q) Nagendra, Sanjai, M.D., LabCorp, 1447 York Court, Burlington, North Carolina (800-762-4344). May have knowledge, if any, of Plaintiff's medical history during the relevant time period.
- r) Paulk, James Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.
- s) Persad, Sarika, St. Joseph Medical Center, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). May have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.
- t) Pina, Antonia, St. Joseph Medical Center, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). Registration clerk who may have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.
- u) Portis, Paul, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.
- v) Revilla, Ramiro, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.
- w) Rose, Johnnie, St. Joseph Medical Center Emergency Department Staff, 1401 St. Joseph Pkwy, Houston, Texas 77002 (713-757-1000). May have knowledge, if any, of the injuries and medical care provided to Plaintiff when at St. Joseph Hospital.
- x) Zavala, John, Houston Fire Department, 500 Jefferson, 17th Floor, Houston, Texas 77002 (832-394-6700). May have knowledge, if any, of the injuries and medical care provided to Plaintiff at HCSO jail and/or during transport to St. Joseph Hospital.

4. County Defendants respectfully reserve the right to elicit testimony from any and all persons or witnesses designated or to be called by Plaintiff in this case. County Defendants reserve the right to offer at trial, from any person or fact witness designated by Plaintiff with the express

understanding that County Defendants do not necessarily vouch for the credibility, qualifications or proper designation of any such witnesses.

5. County Defendants reserve the right to supplement and amend this designation and/or discoverable information up to the date of trial.

6. County Defendants reserve the right to call rebuttal witnesses.

Respectfully submitted,

OF COUNSEL:

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TEXAS BAR NO. 24088049
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Date: November 12, 2021.

By: /s/ Jennifer F. Callan
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**Attorneys for Defendants Harris County
and Sheriff Gonzalez**

CERTIFICATE OF SERVICE

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this certificate is attached was served via email and certified mail to the following:

U. A. Lewis

The Lewis Law Group
99 Detering, Suite 100
Houston, Texas 77007

/s/ Jennifer F. Callan
Jennifer F. Callan